

FILED 11 JUL '12 15:39 USDC-ORP

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

Stacey Alexandra Wilson Betts

*(Enter full name of plaintiff(s))*

**Plaintiff(s),**

**v.**

JUSTIN BIEBER, ISLAND DEF JAM RECORDS

VULCAN SPORTS AND ENTERTAINMENT

AEG WORLDWIDE

*(Enter full name of ALL defendant(s))*

**Defendant(s).**

**Civil Case No. 3:12-cv-1253-SI**

*(to be assigned by Clerk of the Court)*

**COMPLAINT**

Jury Trial Demanded

☐ Yes

☒ No

**I. PARTIES**

*List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.*

**Plaintiff**

Name: STACEY WILSON BETTS

Street Address: 27687 SW STAFFORD ROAD

City, State & Zip Code: WILSONVILLE OR 97070

Telephone No. 503-899-9008

COMPLAINT

Revised: July 20, 2010

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**Defendant No. 1** Name: JUSTIN BIEBER  
Street Address: 825 8TH AVE 28TH FLOOR  
City, State & Zip Code: NEW YORK, NEY YORK, 10019  
Telephone No. (212) 333-8000

**Defendant No. 2** Name: ISLAND DEF JAM RECORDS  
Street Address: 825 8TH AVE 28TH FLOOR  
City, State & Zip Code: NEW YORK, NEW YORK 10019  
Telephone No. 212-333-8000

**Defendant No. 3** Name: VULCAN SPORTS AND ENTERTAINMENT  
Street Address: 505 FIFTH AVE S SUITE 900  
City, State & Zip Code: SEATTLE WASHINGTON 98104  
Telephone No. (206) 342-2000

**Defendant No. 4** Name: AEG WORLDWIDE  
Street Address: 800 WEST OLYMPIC BLDV. SUITE 305  
City, State & Zip Code: LOS ANGELES CA 90015  
Telephone No. (213) 763-7700

## II. JURISDICTION

*Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. A case involving the United States Constitution or federal laws or treaties is a federal question case. A case in which a citizen of one state sues a citizen of another state and the amount in damages claimed is more than \$75,000 is a diversity of citizenship case.*

A. What is the basis for federal court jurisdiction (*check all that apply*)

☐ Federal Question

☒ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory, or treaty right is at issue?

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- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state of citizenship OREGON

Defendant(s) state(s) of citizenship NEW YORK, CALIFORNIA, OREGON, WASHINGTON

### III. STATEMENT OF CLAIMS

#### Claim I

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

I TOOK MY DAUGHTER TO A JUSTIN BIEBER CONCERT JULY 14 2010 AT THE ROSE QUARTER IN PORTLAND OREGON. DUE TO AN UNFORESEEN ASPECT OF THE SHOW, I WAS INJURED BY A SOUND BLAST THAT EXCEEDED SAFE DECIBEL LEVELS. I SUFFER HEARING LOSS, SEVERE TINNITUS AND HYPERACUSIS IN BOTH EARS. THE INCIDENT OF INJURY WAS WHEN JUSTIN BIEBER CLIMBED INTO A HEART SHAPED, ALUMINUM/STEEL GONDOLA AND WAS PULLED OUT OVER THE CROWD. MR. BIEBER CREATED A WAVE LIKE EFFECT OF SCREAMING BY POINTING INTO VARIOUS SECTIONS OF THE ARENA. THEN ENTICED THE CROWD INTO A FRENZY OF SCREAMS BY CONTINUOUSLY WAVING HIS ARMS IN A QUICK AND UPWARD MOTION, WHEREAS I WAS STRUCK WITH A SOUND BLAST. THE GONDOLA THAT JUSTIN BIEBER WAS SUSPENDED IN ACTED AS A SOUND CONDUCTOR CREATING A SOUND BLAST THAT PERMANENTLY DAMAGED BOTH OF MY EARS. ISLAND DEF JAM RECORDS REPRESENTS JUSTIN BIEBER, WITH HIS MANAGER AND PROMOTOR, AEG WORLDWIDE, DESIGNS AND DEVELOPES JUSTIN BIEBER'S SHOWS. THE ROSE QUARTER, OWNED BY VULCAN SPORTS AND ENTERTAINMENT IS WHERE THE INJURY TOOK PLACE IN PORTLAND OREGON.



#### IV. RELIEF

*State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.*

I RESPECTFULLY ASK THE COURT TO GRANT AN AWARD OF \$9,230,000.000 FOR EXPENSES,  
PAIN AND SUFFERING, LOSS OF QUALITY OF LIFE, SEVERE TINNITUS, HYPERACUSIS AND  
PERMANENT DISABILITY AND IMPAIRMENT TO BOTH OF MY EARS. I ALSO REQUEST ANY AND  
ALL COURT RELATED FEE'S OR COSTS, WITNESS, TRAVEL AND ANY SUBSEQUENT  
ATTORNEY FEE'S BE PAID BY DEFENDANTS.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11 day of JULY, 20  .

Stacy Wilson Betts  
STACY WILSON BETTS  
(Signature of Plaintiff(s))